



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Luther Allan Markwart, Treasurer
American Sugarbeet Growers Association
Political Action Committee
1156 15th Street, NW, Suite 1101
Washington, DC 20005

JUN 18 2002

Identification Number: C00167684

Reference: Amended Mid-Year Report (1/1/01-6/30/01), dated 2/20/02

Dear Mr. Markwart:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portions attached) discloses one or more contributions which appear to be from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

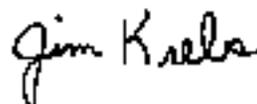
Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from other political committees, such as PACs, should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Schedule B supporting Line 28(a) discloses a refund of a contribution made to the Great Lakes Sugarbeet Growers PAC. However, it appears that this contribution was not previously reported by your committee. Please amend the appropriate report(s) and disclose the original date of the contribution on Schedule A supporting Line 11(c) of the Detailed Summary Page.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jim Krebs
Reports Analyst
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 10 / 72

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
AMERICAN SUGARBEET GROWERS ASSOCIATION POLITICAL ACTION COMMITTEE

A. Full Name (Last, First, Middle Initial)
Gregory Lackman

Mailing Address
HC 73, Box 715

City State Zip Code
Hysham MT 59038

FEC ID number of contributing federal political committee.

Name of Employer
Self-employed

Occupation
Farmer

Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
500.00

Date of Receipt
05 24 2001

Amount of Each Receipt this Period
500.00

Transaction ID: SA11A1.4169

B. Full Name (Last, First, Middle Initial)
Henry Schneider

Mailing Address
HC 3B

City State Zip Code
Hardin MT 59034

FEC ID number of contributing federal political committee.

Name of Employer
self-employed

Occupation
farmer

Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
222.52

Date of Receipt
03 22 2001

Amount of Each Receipt this Period
222.52

Transaction ID: SA11A1.4221

C. Full Name (Last, First, Middle Initial)
Holly Sugar Company

Mailing Address
P.O. Box 9

City State Zip Code
Sugar Land TX 77487

FEC ID number of contributing federal political committee.

Name of Employer
Holly Sugar Corporation

Occupation
D

Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
2500.00

Date of Receipt
03 13 2001

Amount of Each Receipt this Period
2500.00

Transaction ID: SA11A1.4158

SUBTOTAL of Receipts This Page (optional) ▶

TOTAL This Period (last page this line number only) ▶

3222.52

